

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VITAS HOSPICE SERVICES, L.L.C.,
et al.,

Defendants.

Case No. 13-00449-CV-BCW

**JOINT MOTION FOR STAY AND
RELIEF FROM SCHEDULING ORDER DEADLINES
(with supporting suggestions incorporated)**

The parties have reached a framework for settlement of the claims in this action, pending further necessary approvals. The parties move the Court to stay the action and to relieve the parties from compliance with all deadlines in the current Scheduling Order for 60 days. In support of these requests, the parties state as follows:

Further discussions and negotiation are required to complete an agreement and draft a final settlement document. Authority for the settlement and approval of the final settlement agreement must be obtained from the relevant government officials at the Department of Justice and the Department of Health and Human Services, and Defendants' Board of Directors. The parties anticipate the entire settlement process will take at least 60 days.

Wherefore, the parties request the Court to enter an order staying the action and relieving the parties from compliance with all deadlines in the Scheduling Order for a period of 60 days.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of July, 2017 the foregoing was filed via CM-ECF, which will automatically serve a copy upon all counsel of record.

/s/ Lucinda S. Woolery
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